

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 21-55 (MJD)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JARED JOHN FIEGE,

Defendant.

MOTION TO EXTEND DEADLINE
TO FILE SENTENCING
POSITIONS

The United States of America, by and through its attorneys W. Anders Folk, Acting United States Attorney for the District of Minnesota, and Assistant United States Attorney Lindsey Middlecamp, hereby moves the Court for a revised deadline for the parties' sentencing position papers to be due two weeks prior to the as of yet unscheduled sentencing hearing in this matter. The grounds for this motion are as follows:

The Presentence Investigation Report was filed on September 29, 2021, setting a sentencing position pleadings deadline of October 13, 2021. However, to date, no sentencing hearing has been set. The Government's efforts to reach victims in order to obtain impact statements and, where applicable, restitution demands are ongoing. So far, two victim statements have been submitted, but more are anticipated. An extension is therefore appropriate to ensure the sentencing position pleadings can take victim impact into account.

Furthermore, as the PSR notes in paragraph 127, Mr. Fiege's criminal history analysis remains somewhat in flux as he resolves several prior criminal offenses. In the event these state criminal matters are resolved prior to the parties' sentencing position pleadings, it will allow the parties greater clarity in their analysis of the applicable guidelines and any appropriate departure motions.

The Government has notified counsel for Mr. Fiege of this request and the he has indicated he does not oppose the deadline being extended. The Government respectfully proposes that a deadline to be set two weeks prior to a sentencing hearing date will provide adequate time to continue the parties' efforts to gather victim input and other materials relevant to the Court's consideration, while still providing the Court with two weeks to consider the memoranda prior to sentencing.

Dated: October 7, 2021

W. ANDERS FOLK
Acting United States Attorney

/s/ Lindsey E. Middlecamp
BY: LINDSEY E. MIDDLECAMP
Assistant United States Attorney